

SHIRLEY C. WANG (SBN 187635)
swang@saberlaw.com
MAUREEN K. BOGUE (SBN 194755)
mbogue@saberlaw.com
OLIVIA R. BIANCHI (SBN 351643)
obianchi@saberlaw.com
SABER LAW GROUP
101 Howard Street, Suite 400
San Francisco, California 94105
Telephone: (415) 278-1400
Facsimile: (415) 278-1401

Attorneys for Defendants
AMAZON.COM, INC., AMAZON.COM
SERVICES LLC and AMAZON LOGISTICS, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CHASE NELSON, an individual,

Plaintiff,

vs.

AMAZON.COM INC.; AMAZON.COM
SERVICES, LLC; AMAZON LOGISTICS, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 2:24-CV-01710-DJC-AC

**STIPULATION AND ORDER TO
CONTINUE DISCOVERY RELATED
DEADLINES**

Complaint filed: May 09, 2024
Removal Date: June 14, 2024

IT IS HEREBY STIPULATED and agreed to by and between Plaintiff CHASE NELSON (“Plaintiff”) and Defendants Amazon.com, Inc., Amazon.com Services LLC, and Amazon Logistics, Inc. (“Defendants”) (collectively, the “Parties”) by and through their respective counsel as follows:

1. Fact discovery is ongoing, both Parties have served written discovery requests, and Plaintiff’s deposition is pending.

2. The Court set the following deadlines in its September 3, 2024 Scheduling Order (Docket 5):

- April 25, 2025 – Fact Discovery Cutoff
- May 23, 2025 – Disclosure of initial experts and expert reports,
- June 20, 2025 – Disclosure of expert testimony intended solely for rebuttal
- July 18, 2025 – Expert Discovery Cutoff
- September 26, 2025 – Deadline for filing dispositive motions
- November 13, 2025 – Hearing date for dispositive motion(s)
- March 30, 2026 – Start of jury trial

3. The Parties have good cause to request a 45-day extension of the discovery deadlines currently set for April 25, 2025, May 23, 2025, June 20, 2025, and July 18, 2025. The Parties have been diligently conducting discovery. Lead trial counsel for Plaintiff and Defendants have been called to trial at different times, impacting dates previously scheduled for Plaintiff's deposition. The Parties request this extension in order to have adequate time to conduct thorough discovery, including key depositions.

4. The Parties have not requested prior continuances or any other relief related to the Court's Scheduling Order.

5. Pursuant to this Court's Scheduling Order, on February 18, 2025, counsel for Defendant sent an email to the Court's Courtroom Deputy to discuss the proposed modifications. On February 19, 2025, the Courtroom Deputy, Mr. Gabriel Michel, notified the Parties by email that this Court was amenable to the proposed modifications, with the understanding that any dispositive motions shall be filed as previously ordered and the remaining pretrial schedule will not be altered at this time.

THEREFORE, based upon the foregoing, the Parties hereby stipulate and request the Court **ORDER** the following:

1. The fact discovery cutoff is continued to **June 9, 2025**.
2. The initial expert disclosure deadline is continued to **July 7, 2025**.
3. The rebuttal expert disclosure deadline is continued to **August 4, 2025**.
4. The expert discovery cutoff is continued to **September 1, 2025**.
5. All other deadlines set by the Court will remain unchanged.

IS IT IS SO STIPULATED.

1 Dated: February 21, 2025

SABER LAW GROUP

2 By: Maureen K. Bogue
3 MAUREEN K. BOGUE
4 Attorneys for Defendants
5 AMAZON.COM, INC., AMAZON.COM
6 SERVICES LLC and AMAZON LOGISTICS,
7 INC.

8 Dated: February 21, 2025

J. WRIGHT LAW GROUP, P.C.

9 By: /s/ Jamie Wright
10 JAMIE WRIGHT
11 Attorney for Plaintiff
12 CHASE NELSON
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

The Court, having reviewed the foregoing stipulation, and good cause appearing therefore,

HEREBY ORDERS:

1. The fact discovery cutoff is continued to June 9, 2025.
2. The initial expert disclosure deadline is continued to July 7, 2025.
3. The rebuttal expert disclosure deadline is continued to August 4, 2025.
4. The expert discovery cutoff is continued to September 1, 2025.

Dated: February 21, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE